

APPENDIX M

Deposition of James Patrick "Jase" Bolger - 8/23/2018
League of Women Voters of Michigan, et al. v. Ruth Johnson, the Secretary of the State of Michigan

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1 **A. I don't recall the timing.**
2 Q. Does it sound right that you'd want to have
3 maps available the first week of June so
4 that you could talk with members?
5 **A. I just don't remember the time -- timeline.**
6 Q. Okay.
7 **A. We're talking about almost eight years ago**
8 **and how many thousands of meetings I've had**
9 **since then.**
10 Q. Fair point. I have to ask. And let me just
11 tell you, the reason I'm asking is there may
12 well be a trial in this case, and we're
13 going to want to know who knows what about
14 the events, so --
15 **A. I don't blame you for asking.**
16 Q. Yeah.
17 **A. I don't remember.**
18 Q. Yeah, and that's fair. I just -- I will
19 tell you, if you say I don't remember now,
20 and then you go and testify in trial that,
21 oh my God, I remember with perfect clarity,
22 and this is what happened, we will have
23 concerns. I'm not saying that will ever
24 happen, but that's why I'm asking you the
25 questions.

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1 So, point 3 on this April 21st
2 agenda says: "Legislation (timing)" and it
3 references "(leadership)."
4 Is that -- would that have referred
5 to you?
6 **A. You're asking me to guess somebody else --**
7 **what somebody else put in. I don't know.**
8 Q. Well, I don't want you to guess, at least in
9 this context.
10 Do you remember presenting on the
11 timing of legislation at any of these
12 meetings?
13 **A. No, I don't remember.**
14 Q. Let's go to the next one. So, this is an
15 April 2011 meeting, and the second bullet
16 point says: "Database status update and
17 political data (Stuckey and LaBrant)."
18 Do you see where I'm referring to?
19 **A. I do.**
20 Q. Do you remember Bob LaBrant being at any
21 meeting you were at?
22 **A. You're asking about this meeting, and I**
23 **don't remember.**
24 Q. Or any meeting?
25 **A. Any meeting on what subject?**

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1 Q. Fair point. So, Senator Hune testified
2 yesterday that Mr. LaBrant is the Godfather
3 of Michigan Redistricting, so I want to know
4 only about redistricting.
5 Do you recall being at any meetings
6 with Mr. LaBrant about redistricting?
7 **A. I don't specifically recall that.**
8 Q. Okay. Do you agree or disagree with the
9 notion that Mr. LaBrant is the Godfather of
10 Michigan Redistricting?
11 **A. I would not have used that.**
12 Q. Okay. So I take it -- okay. That's fair.
13 Does the bullet point in point 2
14 with reference to political data refresh
15 your recollection about whether political
16 data was used in connection with the 2011
17 redistricting?
18 MR. ELLSWORTH: Bullet point -- you
19 mean numbered paragraph 2?
20 MR. JUSTMAN: Agenda item with the
21 Arabic numeral 2.
22 MR. ELLSWORTH: I -- I object to
23 the form, because I don't think that
24 reference says political data. It simply
25 says data if I read it correctly and if I'm

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1 looking at what you're looking at.
2 MR. JUSTMAN: Just to make sure,
3 Pete, that we're on the same page, 5296?
4 MR. ELLSWORTH: Yeah.
5 MR. JUSTMAN: Bullet point 2:
6 "Database update and political data."
7 MR. ELLSWORTH: Okay, I'm sorry.
8 I'm sorry.
9 BY MR. JUSTMAN:
10 Q. I'm literally not trying to add words where
11 there aren't any, but I'm wondering if that
12 refreshes your memory about whether
13 political data was discussed at any meeting
14 you were at?
15 **A. No, because I don't understand what**
16 **political data means there.**
17 Q. That was going to be my next question, so --
18 and I take it the references to leadership
19 in numbered items 5 and 6 don't trigger any
20 bells for you either?
21 **A. No.**
22 Q. Okay. Let's go to the next one. That also
23 references political data in item 2, and
24 there's a reference to leadership on item 6
25 for this May 11th meeting.